ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL
FILE

In the Matter of	)	
	)	
Billed Party Preference	)	CC Docket No. 92-77
for 0+ InterLATA Calls	)	

To: The Commission

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AUG 27 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS

OF

THE CHILLICOTHE TELEPHONE COMPANY

THE CHILLICOTHE TELEPHONE COMPANY

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SUMMARY

The Chillicothe Telephone Company ("Chillicothe") replies to comments submitted on the Commission's proposed billed party preference ("BPP") rules.

Chillicothe believes the marginal convenience of reaching one's preferred OSP by dialing "0" rather than "10XXX" (or even a longer "800" or "950" access code) wholly fails to justify the $1 billion or greater costs of implementing even the most limited interLATA payphone BPP system. There is simply no substantial evidence that consumers want BPP or that they are willing to pay the additional 10-to-18 cents or more, per "0" call, that BPP will cost them. Finally, the most pernicious effect of the implementation of an unneeded and unwanted BPP system is that it may delay or preclude investment in other more critical facilities and services.

In addition, Chillicothe believes that the BPP plan proposed by the Commission would drive many smaller, primarily "0+" OSPs from the market, thereby impairing operator service competition. This, in turn, will force curtailment or discontinuation of the independent LEC operator services.

In conclusion, Chillicothe requests the Commission not to mandate billed party preference.

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The Chillicothe Telephone Company ("Chillicothe"), by its attorneys, hereby submits its reply comments in the captioned proceeding.

After reviewing the comments filed with the Commission on July 7, 1992, Chillicothe has found that the substantial costs required to implement and operate automated billed party preference ("BPP") routing for "0+" interLATA calls (and the resulting increases in operator service rates) are not justified by the marginal additional benefits that consumers will realize from BPP systems. In addition, Chillicothe believes that the BPP plans under consideration will impair operator services competition by favoring large national and regional carriers at the expense of the smaller local facilities maintained by independent telephone companies.

The Chillicothe Telephone Company

Chillicothe is an independent local exchange carrier ("LEC") serving over 25,000 access lines in ten exchanges in Ross County, Ohio. In addition, Chillicothe has provided operator services since 1895, a period of service second only to that of AT&T. At present, Chillicothe furnishes intraLATA and local operator services for its own local exchange customers, and, on a contract basis, to prisons, alternative operator service ("AOS") companies, and an interexchange carrier ("IXC").

The Costs of BPP Do Not Justify Its Benefits

In determining whether to mandate the implementation of a new service, the Commission should ask the following five questions:

1. What are the potential public interest benefits of the new service?
2. Is there significant public demand for the new service?
3. What are the costs likely to be incurred by carriers to establish and provide the new service?
4. Is the public willing to pay the increased rates and charges necessary for carriers to recover these costs?
5. Are the resources of carriers and the public most productively invested in the proposed new service, or in alternative services and technologies?

In its Notice Of Proposed Rulemaking (Billed Party Preference for 0+ InterLATA Calls), 7 FCC Rcd. 3027 (1992) (released May 8, 1992) ("NPRM"), the Commission addressed two of these five questions -- namely, the potential public interest benefits of billed party preference (Question 1) and the costs thereof (Question 3). It tentatively concluded that billed party preference might benefit the users of operator services by automatically routing their "0" calls through their carriers of choice without complicated dialing requirements, and by redirecting the focus of operator service provider ("OSP") competition from those who are paid commissions to end users (NPRM, para. 13). However, the Commission emphasized that it needed substantial additional information concerning the cost of BPP systems before it could decide whether to require the implementation of BPP and, if so, how to structure it (NPRM, para. 25).

The initial comments in this proceeding indicate that the implementation costs alone of the most limited BPP systems will approach $1 billion, while the incremental public interest benefits of BPP are becoming increasingly marginal. Hence, on a pure cost-benefit basis, Chillicothe does not believe that BPP should be mandated. Moreover, the record in this proceeding does not contain persuasive evidence of significant public demand for automated billed party preference, nor indication that the public is willing to pay the additional operator service charges necessary to finance the implementation and operation of BPP systems. Finally, there is no evidence that the resources of carriers and the public would be more productively devoted to BPP than to facilities enhancing network reliability and/or to alternative new technologies and services such as video dialtone.

Public interest benefits. Whereas BPP can make operator-assisted calling somewhat more "user-friendly" for the public, the degree and significance of this "user-friendliness" will decrease as the Commission's goal of "universal 10XXX access"[1] becomes a reality during the next six years. While being able to reach one's preferred OSP by dialing "0" is plainly convenient, accessing that OSP by dialing the additional four digits of its "10XXX" code is not significantly more onerous or time-consuming for most consumers.[2] In fact, the use of "10XXX" codes can give

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[1] See Report and Order and Further Notice of Proposed Rule Making (Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation), 6 FCC Rcd. 4736, 4738 (1991), recon., Order on Reconsideration (Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation), 7 FCC Rcd. 4355 (1992) (released July 10, 1992).

[2] As AT&T has pointed out, the caller is the billed party for the great majority of interLATA "0" calls. For credit card calls, which represent approximately 69 percent of AT&T's "0" traffic, the caller is normally the billed party, or an employee or relative of the billed party (AT&T Comments, at 6). For collect calls, which comprise 19.4% of AT&T's "0" traffic, the calling party is the billed party, or an employee or relative of the billed party at least half of the time (id. at 8). For sent-paid calls, which comprise 6.4% of AT&T's "0" traffic, the calling party is always the billed party. And, for third-party calls, which comprise 4.9% of AT&T's "0" traffic, the calling party is billing the call to his or her home or business phone approximately 95% of the time.

consumers valuable flexibility (not readily attainable in a BPP world) to spread their operator-assisted calls among several OSPs for quality, economic and other reasons.[3]

As this Commission is aware, the vast majority of consumer complaints concerning the cost and quality of OSP services have come from travellers who were previously forced to use OSPs presubscribed to public payphones and to phones in "aggregator" locations such as hotels, motels, hospitals, and universities. The branding, access code unblocking and informational tariff provisions of the Telephone Operator Consumer Services Improvement Act of 1990 ("TOCSIA") have only recently been implemented by the Commission. Before imposing new BPP implementation and operating costs upon carriers and their customers, the Commission should give these TOCSIA reforms an opportunity to work. It is quite possible that they may solve a substantial portion of the public's complaints concerning "0" service and charges, thereby rendering BPP a minimal or unnecessary service.

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[3] For example, carrier service quality and charges may vary along different routes. A customer may prefer to use Carrier XYZ's less expensive service between City A and City B, and Carrier MNO's less expensive service between City A and City C. Likewise, a customer may prefer to use Carrier GHI's expensive, higher quality service for important business or data calls, and Carrier TUV's less costly, lower quality service for personal calls.

BPP costs. In response to the Commission's data request, the Regional Bell Operating Companies ("RBOCs"), GTE Service Corporation ("GTE") and Southern New England Telephone Company ("SNET") submitted estimates of the costs of implementing and initially operating billed party preference plans within their local exchange areas. These estimates were as follows:

> Ameritech: $52,470,000 in one-time expenses[4] and $29,281,000 in annual operating expenses for a BPP system covering interLATA 0+ and 0- traffic from all lines (16 cents per call); $48,011,000 in one-time expenses and $25,164,000 in annual operating expenses for a BPP system covering interLATA payphone traffic (18 cents per call); and $50,787,000 in one-time expenses and $20,921,000 in annual operating expenses for a BPP system covering interLATA 0+ traffic from all lines (14 cents per call) (Ameritech Comments, at 16).
>
> Bell Atlantic: $86 million in one-time expenses, $39.5 million in capital expenses and $8.6 million in annual operating expenses for a BPP system covering interLATA 0+ and 0- traffic from all lines; $82 million in one-time expenses, $28 million in capital expenses and $5 million in annual operating expenses for a BPP system covering interLATA payphone traffic; and $86 million in one-time expenses, $39 million in capital expenses and $7 million in annual operating expenses for a BPP system covering interLATA 0+ traffic from all lines (Bell Atlantic Comments, Attachment A).
>
> BellSouth: $120,681,000 in initial expenses, $24,936,000 in capital expenditures and $6,850,000 in annual recurring expenses for a BPP system covering interLATA 0+ and 0- traffic from all lines (11 cents per call); with estimates that costs for more limited

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[4] One-time and capital expenses include operator service switch upgrades, end office switch upgrades, end office trunking upgrades and additions, Line Information Data Base ("LIDB") upgrades and modifications, Automated Alternative Billing System ("AABS") upgrades and modifications, initial operator training costs, and initial customer education and balloting costs.

interLATA payphone and/or interLATA 0+ traffic BPP systems would not be reduced significantly, while per call charges would be much higher (BellSouth Comments, at 12).

NYNEX: Over $82.6 million in one-time and capital expenses, and $13.7 million in annual operating expenses for a BPP system covering interLATA 0+ and 0- traffic from all lines (16.36 cents per call); $71.1 million in one-time and capital expenses, and $3.8 million in annual operating expenses for a BPP system covering interLATA 0+ payphone traffic (17.72 cents per call); $77.5 million in one-time and capital expenses, and $6.5 million in annual operating expenses for a BPP system covering interLATA 0+ traffic from all lines (15.13 cents per call); and $72.8 million in one-time and capital expenses, and $3.9 million in annual operating expenses for a BPP system covering interLATA public phone traffic (16.60 cents per call). These NYNEX estimates did not include the substantial costs of the software upgrades necessary to deploy Operator Services SS7 to the end office. (NYNEX Comments, at 4-5, Attachments E-H).

Pacific: $116 million in one-time and capital expenses, and $26 million in annual operating expenses for a BPP system covering interLATA 0+ traffic from all lines (Pacific Comments, at 22).

Southwestern Bell: Provided no cost estimates because its vendor prices for BPP had increased from $75 million to $127 million within the two weeks prior to July 7, 1992 (Southwestern Bell Comments, at 10).

U S WEST: $149 million to implement a BPP system covering interLATA 0+ and 0- traffic from all lines; and $113 million to implement a BPP system covering interLATA payphone traffic only (U S WEST Comments, at 4, 6, Appendix).

GTE: $84 million in implementation costs and $23 million in annual operating costs for a BPP system covering interLATA 0+ and 0- traffic from all lines; and $37 million in implementation costs and $1 million in annual operating costs for a BPP system covering interLATA payphone traffic only (GTE Comments, at 11-12).

SNET: $33 million to implement a BPP system covering interLATA 0+ and 0- traffic from all lines; $23 million to implement a BPP system covering interLATA payphone traffic; and $31 million to implement a BPP system covering interLATA 0+ traffic from all lines (SNET Comments, at 3).

While Chillicothe recognizes that these estimates are based on varying assumptions, it nonetheless appears that the most limited and least expensive BPP system -- the interLATA payphone-only system -- will cost between $750 million and $1 billion to implement, and approximately $75 million to $100 million per year to operate, in the RBOC/GTE/SNET local exchange areas alone.[5]

In addition, smaller local exchange carriers ("LECs") will incur substantial costs, in the aggregate, to implement and operate BPP systems. As the United States Telephone Association ("USTA") and the Organization for the Protection and Advancement of Small Telephone Companies ("OPASTCO") have recognized, these implementation and operating costs will vary greatly, and will depend on the nature of installed equipment and on the degree of Signalling System 7 deployment (USTA Comments, at 3; OPASTCO Comments, at 3-4). Chillicothe believes, however, that the RBOC/GTE/SNET cost estimates are representative, in terms of scale, as to the costs that would be incurred by smaller local exchange carriers.

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[5] Chillicothe is confident that the RBOC/GTE/SNET cost estimates for BPP are *bona fide* and reasonable. While NYNEX ultimately determines that the costs of BPP outweigh its potential benefits, none of the RBOC/GTE/SNET companies opposes in principle the implementation of BPP. In fact, Ameritech, Bell Atlantic, Pacific and GTE are quite supportive of the billed party preference concept.

On the basis of the Ameritech, BellSouth, and NYNEX estimates, it is likely that billed party preference will cost consumers at least 10-to-18 cents <u>per "0" call</u> in the more populous RBOC/GTE/SNET service areas. This per-call charge is likely to be significantly higher in the less populous, higher cost areas served by smaller LECs.

<u>Public demand and willingness to pay</u>. The critical question to be answered by the Commission is: do consumers want the convenience of dialing "0" rather than their preferred OSP's "10XXX," "800" or "950" access code enough to pay at least 10-to-18 cents per call for this capability?

At this point, the record in this proceeding does not contain probative evidence of the level of public demand for BPP service. In particular, the Commission needs to develop reliable evidence of informed public demand for BPP -- that is, demand by consumers who have been made aware of the benefits of BPP, the alternatives to BPP, and the per-call costs of BPP. The Commission could seek this demand information from interested parties, by issuing a Supplemental Notice of Proposed Rulemaking requesting further submissions and comment. In the alternative, the Commission might want to design and commission a survey of its own before requiring investments of the size needed to implement BPP.

Alternative investments. Finally, neither the Commission's NPRM nor the record in the proceeding indicate whether anyone has considered the opportunity cost of requiring carriers to invest $1 billion or more in BPP systems at a time when capital is urgently needed to improve network reliability, to establish video dialtone, to construct fiber optic facilities to the home or curb, and to develop and implement other new or emerging communication technologies. Given that neither the Commission nor carriers nor the consuming public have unlimited resources, the Commission needs to consider whether an order mandating BPP will result in the abandonment or postponement of investments in more urgently needed facilities and services.

Summary. Chillicothe believes the marginal convenience of reaching one's preferred OSP by dialing "0" rather than "10XXX" (or even a longer "800" or "950" access code) wholly fails to justify the $1 billion or greater costs of implementing even the most limited interLATA payphone BPP system. There is simply no substantial evidence that consumers want BPP or that they are willing to pay the additional 10-to-18 cents or more, per "0" call, that BPP will cost them. Finally, the most pernicious effect of the implementation of an unneeded and unwanted BPP system is that it may delay or preclude investment in other more critical facilities and services.

<u>BPP Will Impair Operator Service Competition</u>

Chillicothe believes that the Commission's goal of redirecting the focus of OSP competition from the size of aggregator commissions to the quality of service provided to end users (<u>NPRM</u>, para. 13) will be furthered more by the Commission's recently implemented TOCSIA branding, unblocking, informational tariff and compensation rules, than by mandating unnecessary and expensive BPP systems. As indicated above, the TOCSIA regulations give consumers the information and capabilities necessary to route their "0" calls through their OSP of choice, and accomplish this task without the expense and dislocations inherent in BPP.

Chillicothe agrees with Capital Network System ("CNS") and International Telecharge, Inc. ("ITI") that the billed party preference plan proposed by the Commission -- and particularly the proposed processes which favor existing "1+" carriers in the assignment of "0+" carriers -- would drive many smaller, primarily "0+" OSPs from the market, thereby impairing operator service competition (CNS Comments, at 19-22; ITI Comments, at 8-13).

As the Commission is well aware, a new competitive operator services industry has arisen and developed since the AT&T divestiture. Many of the entrants into this industry are small companies that have focused on "0" service, since they lacked the resources to compete effectively with AT&T, MCI and Sprint. Whereas the intensity of the competition in the OSP industry has spawned some abuses, the Commission's newly implemented TOCSIA rules appear capable of remedying most of these problems.

The Commission's proposed methods for assigning a "0+" carrier will effectively default all lines of nonresponding customers to their existing "1+" carriers (NPRM, para. 33). The Commission has indicated that one possibility was for LECs to send "0+" ballots to their subscribers and to assign non-responding subscribers by default to their existing "1+" carriers (id.). The other possibility mentioned by the Commission was for LECs simply to notify their subscribers that they had a right to presubscribe to a "0+" carrier different from their "1+" carrier (id.). Under either approach, existing "1+" carriers would receive an overwhelming competitive advantage over OSPs offering only "0+" service. Particularly since there is no evidence of any discernible public demand for BPP, there is unlikely to be any significant public response to the "0+" ballots or notices contemplated by the Commission. Therefore, whether intended or not, the vast majority of telephone lines will be assigned by default to existing "1+" carriers for "0+" service as well. Moreover, since the BPP system will automatically route "0" calls on these primarily default assignments, there will be no significant incentive for hotels, motels, hospitals, universities and other "aggregators" to presubscribe their public telephones to smaller, primarily "0+" OSPs. Hence, BPP -- at least, as presently contemplated -- will literally drive most of the smaller "0+"-only OSPs from the operator service market.

The destruction of "0+"-only OSPs will also have an adverse impact upon the local operator service systems of independent local exchange carriers like Chillicothe. Specifically, it will deprive independent LECs of a critical source of revenue -- which they presently obtain from the provision of operator functions via contract to small OSPs -- that is necessary to sustain their local operator facilities.

Chillicothe and other independent LECs have traditionally provided operator services for calls originating within their local service areas. These localized operator systems not only serve as the caller's first point of contact with the network for intraLATA calls, but also furnish numerous additional services requiring familiarity with local geography and conditions. The latter include responding to emergency calls and directing the appropriate police, fire, ambulance or rescue personnel to the scene; answering local information requests from visitors to the area; monitoring network emergency alarm conditions required to maintain network integrity; and responding to emergency calls by customers who have failed to dial "911." In addition, independent LEC operator facilities constitute important sources of employment in many rural communities.

In the case of Chillicothe and many other independent LECs, local operator service traffic is not quite sufficient to finance the facilities and personnel necessary to provide quality operator service at rates that local customers are willing to pay. Therefore, as noted on page 2 above, Chillicothe presently supplements its local operator service revenues by furnishing operator functions via contract to several AOS companies (that is, to small, primarily "0+" OSPs) and to an IXC. If one of these AOS companies were to be driven out of the operator service business due to BPP, Chillicothe would lose critical revenues which it needs to sustain its local operator facility, together with the efficiencies which are conferred, vis-à-vis the Company's operator service function, through the higher traffic which this AOS business provides. If more than one of these AOS companies were lost, Chillicothe would have to substantially increase its intraLATA operator service rates, or significantly reduce the number and quality of its operator services. Ultimately, if its lost revenues and traffic volumes could not be replaced, Chillicothe might have to consider the discontinuation of its 97-year-old local operator service program.

Thus, in the aggregate, the destruction of "0+" OSPs will have a ripple effect in that it will force curtailment or discontinuation of the independent LEC operator services which provide them with contract operator functions. The ultimate result of BPP is likely to be an operator service industry comprised solely, or virtually solely, of the operator services of AT&T, MCI, Sprint and the Tier 1 LECs. In Chillicothe's view, this will constitute a grossly anti-competitive result, and not the refocused "competition" which the Commission has indicated that it desires.

Conclusion

WHEREFORE, the above premises considered, the Commission is respectfully requested not to mandate automated billed party preference on the grounds: (a) that the substantial implementation and operating costs for BPP grossly outweigh its marginal benefits, (b) that the public has given no indication that it wants billed party preference at the rates that will need to be charged for it, (c) that the large investment needed to implement BPP will preclude or delay investment in more valuable facilities and services, and (d) that operator service competition will decline as BPP forces "0+" OSPs and independent LEC operator services from the market.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Francine Steadman, hereby certify that I am an employee with the Law Offices of Blooston, Mordkofsky, Jackson & Dickens, and that on this 27th day of August, 1992, copies of the foregoing "REPLY COMMENTS OF CHILLICOTHE TELEPHONE COMPANY" in CC Docket No. 92-77 were served by first-class mail, postage prepaid, unless otherwise indicated, upon parties on the attached list.

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